

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re : Chapter 13
Dariys W. Hinton :
Debtors : Bankruptcy Case No. 23-12037

DEBTOR'S RESPONSE TO TRUSTEE'S OBJECTION TO CONFIRMATION

1. Debtor filed his bankruptcy petition with the Court on July 11, 2023, bearing case number 23-12037.
2. The Court scheduled a 341 Meeting for September 6, 2023.
3. The Court also scheduled a Confirmation Hearing on this case for September 14, 2023.
4. The Chapter 13 Trustee filed an objection to Confirmation on September 21, 2023.
5. All of the items listed in the Chapter 13 Trustee's Objection were provided to the Chapter 13 Trustee before the September 14, 2023 Confirmation Hearing.
6. The bar date for creditors to file a proof of claim with the Court was on September 19, 2023.
7. Secured Creditor, Santander Bank, filed a proof of claim on September 19, 2023 with arrears in the amount of \$539.82.
8. Counsel for the Debtor filed an amended plan to address the arrears in secured creditors claim on September 22, 2023.
9. The new confirmation hearing Date is October 5, 2023.
10. The amended chapter 13 plan should be confirmed on or about October 5, 2023

WHEREFORE, the Chapter 13 Trustee's Objection to Confirmation should be denied in its entirety. Debtor's Chapter 13 Plan should be confirmed over the Chapter 13 Trustee's Objection to Confirmation.

September 22, 2023

/s/ Mitchell Lee Chambers, Esquire
602 Little Gloucester Road
Suite 5
Blackwood, NJ 08012

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CERTIFICATE OF SERVICE

I, Mitchell Lee Chambers, Esquire, counsel for Debtor, does hereby certify that, on the date hereof, I caused to be served, by fax or first class United States mail, postage prepaid, a true and correct copy of Debtor's Response upon the Trustee, the Respondent, and other interested parties, at the following fax numbers or addresses:

VIA ECF

Kenneth West, Standing Trustee
1234 Market Street
Philadelphia, PA 19107

VIA EMAIL

Dariys Hinton
5358 Wingohocking Terrace
Philadelphia, PA 19144

September 22, 2023

/s/ Mitchell Lee Chambers, Esquire
602 Little Gloucester Road
Suite 5
Blackwood, NJ 08012